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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUSTIN MICHAEL VANDERWOUDE AND  
DANA JEAN STEELE,

Defendants.

Case No. 1:21-CR-00073 RJS

INITIAL NOTIFICATION OF  
COMPLIANCE AND REQUEST FOR  
RECIPROCAL DISCOVERY

Judge Robert J. Shelby

The United States of America, by and through the undersigned, hereby files its initial notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for the defendant via *USAfx*:

Discovery produced: NOC 1	Bate Numbered Documents: See Attached Discovery Index
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As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use at trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 25th day of June, 2021.

JOHN W. HUBER  
United States Attorney

/s/ Nathan D. Lyon  
GAGE H. ARNOLD  
NATHAN D. LYON  
Special Assistant United States Attorneys

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of the United States Attorney's Office, and that a copy of the foregoing INITIAL NOTIFICATION OF COMPLIANCE was made available to all parties identified below on June 25, 2021.

Kristen Angelos  
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/s/ Beth Z. McAlpin  
Beth Z. McAlpin  
Legal Administrative Specialist

## US v. Justin Vanderwoude, et al DISCOVERY INDEX

Category	Folder Name	Description	BATES BEGIN	BATES END	RELATED C/SOURCE	INC.
Media	Jail Calls - Davis County Correction Facility	10.61.0.2.1-0fd473b9a3d000154898f163dd4bd0.wav	AV-DCCF-JMV-01-00000	AV-DCCF-JMV-01-00001	Agent 1	1
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		10.61.0.2.1-23b7f5ba0a3d000154898f163c1c970b.wav	AV-DCCF-JMV-01-00005	AV-DCCF-JMV-01-00005	Agent 1	1
		10.61.0.2.1-8094318a0a3d0001562686f71550f7cc2.wav	AV-DCCF-JMV-01-00006	AV-DCCF-JMV-01-00006	Agent 1	1
		10.61.0.2.1-05782d880a3d000154898f163e726f20.wav	AV-DCCF-JMV-01-00007	AV-DCCF-JMV-01-00007	Agent 1	1
		10.61.0.2.1-75717670a3d000153500f1d7fd018.wav	AV-DCCF-JMV-01-00008	AV-DCCF-JMV-01-00008	Agent 1	1
		10.61.0.2.1-769888ce0a3d000153500f1d7fd018.wav	AV-DCCF-JMV-01-00009	AV-DCCF-JMV-01-00009	Agent 1	1
		10.61.0.2.1-09489156a3d000153500f1d7fd018.wav	AV-DCCF-JMV-01-00010	AV-DCCF-JMV-01-00010	Agent 1	1
		10.61.0.2.1-c34048a3d000153601f014d70e0831.wav	AV-DCCF-JMV-01-00011	AV-DCCF-JMV-01-00011	Agent 1	1
		10.61.0.2.1-09ac026d3a3d000155385f56e96969.wav	AV-DCCF-JMV-01-00012	AV-DCCF-JMV-01-00012	Agent 1	1
		10.62.0.2.1-0f02e3b0a3d000155385f56e96969.wav	AV-DCCF-JMV-01-00013	AV-DCCF-JMV-01-00013	Agent 1	1
		10.62.0.2.1-0ff0e23b0a3d000155385f56e96969.wav	AV-DCCF-JMV-01-00014	AV-DCCF-JMV-01-00014	Agent 1	1
		10.62.0.2.1-51f1249ed3a3d000155385f56e96969.wav	AV-DCCF-JMV-01-00015	AV-DCCF-JMV-01-00015	Agent 1	1
		10.62.0.2.1-51f1249ed3a3d000155385f56e96969.wav	AV-DCCF-JMV-01-00016	AV-DCCF-JMV-01-00016	Agent 1	1
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		10.65.0.2.1-4650e99a4a1001517fa77843c2f62e.wav	AV-DCCF-JMV-01-00029	AV-DCCF-JMV-01-00029	Agent 1	1
		10.65.0.2.1-784286a4a100151584811c5814f159d.wav	AV-DCCF-JMV-01-00030	AV-DCCF-JMV-01-00030	Agent 1	1
		10.65.0.2.1-7899487a4a1001515946cd410788f.wav	AV-DCCF-JMV-01-00031	AV-DCCF-JMV-01-00031	Agent 1	1
		10.65.0.2.1-574958a3d00015157fa778ebad7c7.wav	AV-DCCF-JMV-01-00032	AV-DCCF-JMV-01-00032	Agent 1	1
		10.65.0.2.1-5669da3f30a150c9341d91339e.wav	AV-DCCF-JMV-01-00033	AV-DCCF-JMV-01-00033	Agent 1	1
		10.65.0.2.1-149ec0d4a400150c9341d91339e.wav	AV-DCCF-JMV-01-00034	AV-DCCF-JMV-01-00034	Agent 1	1
		10.65.0.2.1-2831144d0a40015151a94dca1d91339e.wav	AV-DCCF-JMV-01-00035	AV-DCCF-JMV-01-00035	Agent 1	1
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		10.66.0.2.1-4650e99a4a1001517fa77843c2f62e.wav	AV-DCCF-JMV-01-00040	AV-DCCF-JMV-01-00040	Agent 1	1
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		10.66.0.2.1-4650e99a4a1001517fa77843c2f62e.wav	AV-DCCF-JMV-01-00046	AV-DCCF-JMV-01-00046	Agent 1	1
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		10.66.0.2.1-4650e99a4a1001517fa77843c2f62e.wav	AV-DCCF-JMV-01-00048	AV-DCCF-JMV-01-00048	Agent 1	1
		10.66.0.2.1-784286a4a100151584811c5814f159d.wav	AV-DCCF-JMV-01-00049	AV-DCCF-JMV-01-00049	Agent 1	1
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